



Update Inerts Working Group

National Organic Standards Board Meeting
April 26, 2011
Seattle, Washington

Inert ingredients in pesticides

Any substance ... other than an active ingredient which is intentionally included in any pesticide product. [§ 205.2]

Examples: substances to prevent caking or foaming, preservatives, spreaders, stickers, UV inhibitor, solvents, diluents



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Background

- OFPA permits synthetic inert ingredients that are “not classed by EPA as inert ingredients of toxicological concern”
- Synthetic inert ingredients, classified as List 4 by EPA, are allowed in pesticides for organic use.
- List 3 inert ingredients are allowed in passive pheromone dispensers.

Background

- EPA revised system of assessment in 2006, no longer uses List 1-4
- NOP is operating with obsolete list of inerts, dated August 2004
- Manufacturers are petitioning for use of inerts that do not appear on the old Lists

NOSB recommendation: April 2010

- NOP should create a MOU with EPA to assist in evaluation of former List 3s-4s. May need a task force.
- NOSB and/or task force to review former List 4s to identify any that may be non-synthetic; these should be first choice for pesticide formulations
- Ask manufacturers to provide information on all remaining synthetic inerts in current use, to be reviewed individually as petitions
- Prioritize review of inerts, establish timelines for reformulation
- Result may be individual listing of inerts, or EPA managed list

NOP Actions since April 2010

- Drafted MOU that has been shared with EPA
- Initial meeting with EPA staff – Oct. 2010.
- Follow up meeting with EPA staff – Dec. 2010
- Initial Work Group meeting Feb 2, 2011
- Data gathering and assessment

Inerts Working Group

- NOP: Emily Brown Rosen, Lisa Brines, John Punzi
- EPA: Chris Pfeifer (BPPD), Kerry Leifer (Inerts)
- NOSB: Jay Feldman, Tracy Meidema, Jeff Moyer (ex officio)

Initial findings

- EPA is very willing to assist in assessment, but does not have authority or resources to develop or maintain a special list of organic-compliant inerts
- Goal: to develop a new policy that can be finalized no later than 2017, next sunset date for List 4

Initial findings

- 2004 EPA List 4a & 4b = 879 substances
- EPA currently lists all inerts used on food crops either as exempt from tolerance, or with specific tolerances for residues
- Listed at 40 CFR 180.910-180.960
- EPA also classes some inerts as permitted for use in Minimal Risk products– FIFRA 25(b)

Some options discussed

- Review all synthetic inerts individually
 - Develop screening criteria that can be applied
- Identify subgroups of inerts under EPA Part 180 that might be compatible
 - e.g. 25(b) list
- Evaluate currently used inerts for any patterns or groupings, focus on known use

Data collection

- OMRI and WSDA have shared lists of inerts in current use
- Comparing this to EPA's 25(b) list and the old List 4 to see where overlap and gaps exist
- Identifying nonsynthetic substances

Data collection

- OMRI list includes 251 inerts
 - Of these, approx. 157 are synthetic
- WSDA list overlaps, plus includes 22 additional synthetic inerts
- Total 179 synthetic inerts in these products

Next steps

- Review data, analyze further
 - Compare to EPA 25b list (291 substances)
 - Compare to other EPA tolerance exempt categories
 - See which if any existing categories can be referenced
 - Develop criteria for screening any materials that do not fall in those categories



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Next steps

- Report back to the Board
- Questions?
- Suggestions?